

D. MAX GARDNER, ESQ. (CSB No. 132489)
 930 Truxtun Ave., Suite 203
 Bakersfield, CA 93301
 661-864-7373 tel.
 661-864-7366 fax
 dmgardner@dmxlaw.com

Attorney for Chapter 7 Trustee Jeffrey M. Vetter

**UNITED STATES BANKRUPTCY COURT
 EASTERN DISTRICT OF CALIFORNIA**

Bankruptcy Case No.: 2022-10735

IN RE:

Chapter 7

DOUGLAS PAUL RICE AND SAMANTHA

DMG-2

MARIE RICE,

DEBTORS.

**APPLICATION TO EMPLOY SPECIAL COUNSEL FOR THE CHAPTER 7
 TRUSTEE**

TO THE HONORABLE JENNIFER E. NIEMANN, UNITED STATES
 BANKRUPTCY JUDGE:

Chapter 7 Trustee Jeffrey Vetter ("Trustee") represents as follows:

1. Debtors filed a voluntary petition under Chapter 7 of the United States Bankruptcy Code on April 29, 2022. Jeffrey M. Vetter is the Chapter 7 Trustee in this case.
2. Among the assets of the re-opened Chapter 7 estate is a claim against Amazon or wage

APPLICATION TO EMPLOY SPECIAL COUNSEL

1 and/or other employment claims

2 3. After review of the matter, the Trustee is informed and believes that at a portion of
3 any recovery is in the lawsuit is property of the Debtor's Chapter 7 estate. A true and correct
4 copy of the complaint filed on behalf of the Debtor against Amazon and others is filed
5 concurrently herewith as Exhibit "A". Therefore, the Trustee files this Application seeking the
6 employment of Rahul Sethi as special counsel to the Chapter 7 Trustee.
7

8 4. Sethi's responsibilities as special counsel for the Trustee will be:

9 a. to advise and consult with the Trustee during the prosecution of the lawsuit filed against
10 Amazon; and

11 b. to prepare such pleadings, motions, notices, and orders as are required for the
12 prosecution of the lawsuit filed against Amazon.

13 5. While representing the Debtor, the Trustee does not believe that Sethi has an interest
14 adverse to the Trustee, or the estate in any of the matters upon which he is to be engaged, and
15 Trustee believes that the employment of Sethi will be in the best interest of the estate. A true and
16 correct copy of a contingency agreement outlining the terms of Sethi's compensation is filed
17 concurrently herewith as Exhibit "B". Approval of compensation to Sethi will be sought separately
18 when the matter is resolved.
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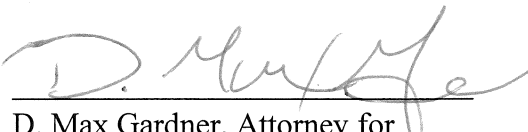
20 6. Based upon the Declaration of Rahul Sethi filed concurrently with this Application,
21 the Trustee believes that Sethi does not hold or represent an interest adverse to that of
22 the Trustee. Trustee believes that Sethi is a disinterested person within the meaning of 11 U.S.C.
23 Section 101(14) and has no connection with Debtor, Trustee, Debtor's creditors, parties in
24 interest, their attorneys and/or accountants, the United States Trustee, or any person employed by
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1 the Office of the United States Trustee, except as may be set forth in the Declaration of Rahul
2 Sethi filed concurrently with this Application.

3 7. Sethi is willing to be employed by the Trustee as special counsel pursuant to the terms
4 of the engagement letter referenced herein. Compensation will be paid to Sethi after Court
5 approval. It is also anticipated that a motion to approve compromise consistent with the
6 provisions of Bankruptcy Rule 9019 will be sought by the Trustee to obtain approval of the
7 disbursement of any monetary judgment obtained through trial or settlement of the lawsuit.
8

9 WHEREFORE, Trustee requests that he be authorized to employ Rahul Sethi as his
10 attorney of record to render service in the areas described above with compensation to be paid as
11 an administrative expense in such amounts as the Court may hereinafter determine and allow.
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14 Dated: June 14th, 2022

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16 D. Max Gardner, Attorney for
17 Chapter 7 Trustee Jeffrey M. Vetter
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